

February 9, 1998

The Honorable Elizabeth A. Moler
Deputy Secretary of Energy
Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585-0113

Dear Deputy Secretary Moler:

The Defense Nuclear Facilities Safety Board (Board) has reviewed your letter of January 16, 1998, forwarding a revised draft of the Department of Energy (DOE) Order 430.1A, *Life Cycle Asset Management*. The Board Members agree that the revised draft Order 430.1A and associated Guides represent an improvement compared with the earlier versions of those documents.

The Board's staff and DOE representatives have had discussions regarding the technical details of the new drafts. In addition, on February 6, 1998, the Board participated in a briefing conducted by DOE and Board staff members who have been involved in attempts to resolve our differences. Based on that briefing, we believe the remaining differences can be resolved in the next week or so.

For your assistance, enclosed is a list of concerns that we believe can be resolved fairly quickly.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.

Enclosure

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List of Concerns

- Requirements and guidance for the time period prior to the “declaration of excess” which create a seamless facility disposition process (includes management of high-hazard residuals as the first step in the facility disposition process).
- A requirement that deactivation and decommissioning plans identify specific end points that ensure ability to control hazards during subsequent actions.
- A need for a contractor requirements document consistent with the requirements of DOE M-251.1-1, Change 1.
- An accurate portrayal of the CERCLA non-time critical process that eliminated jurisdictional questions.
- A cross walk that conforms to the criteria in the Board’s November 12, 1997, letter to Secretary Peña.